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TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

May 17, 2007

JK

TO: Internal File

THRU: Internal File
Pamela Grubaugh-Littig, Permit Supervisor *pgl*

FROM: Wayne H. Western, Team Lead *WHW*

RE: New Ambulance Building, Canyon Fuel Company, LLC, SUFCO Mine,
C/041/0002, Task ID #2806

SUMMARY:

On May 16, 2007, the Division received an amendment from the Permittee in which they requested to demolish the existing ambulance building and replace it with an enlarge building. The Permittee purchased a new ambulance which will not fit into the old building.

TECHNICAL MEMO

TECHNICAL ANALYSIS:

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

Regulatory Reference: 30 CFR 784.2, 784.11; R645-301-231, -301-526, -301-528.

Analysis:

The Permittee met the requirements of this section by providing the Division with update maps that show the location of the new building. In addition, the Permittee updated Table 5-4, Description of Existing Structures, to show when the new ambulance building was constructed.

Findings

The information provided in the proposed amendment is considered adequate to meet the requirements of this section of the regulations.

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

Mining Facilities Maps

The Permittee met the requirements of this section by including updated surface facilities maps. The updated maps include Plate 5-2A and Plate 5-2B.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section of the regulations.

RECLAMATION PLAN

BONDING AND INSURANCE REQUIREMENTS

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

Analysis:

Determination of Bond Amount

The Permittee met the requirements of this section of the regulations. They provided the Division with detailed cost estimates to reclaim the new ambulance building.

The current bond is for \$4,439,000 and the estimated reclamation cost is \$2,630,000 in 2009 dollars. Therefore, the Division has adequate bond to ensure reclamation in the event of bond forfeiture.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section of the regulations.

RECOMMENDATIONS:

The Division should approve the amendment.